

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

INTERNATIONAL BUSINESS MACHINES CORPORATION,)	
)	C.A. No. 16-122-LPS
)	
Plaintiff,)	JURY TRIAL DEMANDED
)	
v.)	
)	PUBLIC VERSION
GROUPON, INC.)	
)	
Defendant.)	

**SUPPLEMENTAL DECLARATION OF KEITH A. WALKER IN FURTHER SUPPORT
OF IBM'S MOTION TO EXCLUDE OCEAN TOMO'S EMPLOYEES FROM
ACCESSING CONFIDENTIAL INFORMATION UNDER THE PROTECTIVE ORDER**

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Dated: September 8, 2017

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EXHIBIT C

**THIS EXHIBIT HAS BEEN
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